

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. Nos. 769 & 819

CERTIFICATION OF COUNSEL

I, Kimberly A. Brown, counsel to the above-captioned debtors and debtors-in-possession (the “Debtors”), hereby certify as follows to the best of my knowledge, information and belief:

1. On February 27, 2023, the Debtors filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) the *Motion of Debtors for Entry of an Order (A) Authorizing the Debtors and the Committee to Enter into Stipulation with the Voyager Debtors and Voyager Committee, (B) Approving the Stipulation, and (C) Granting Related Relief* [D.I. 769] (the “Motion”).

2. On March 7, 2023, the duly appointed joint provisional liquidators of FTX Digital Markets Ltd. (the “Joint Provisional Liquidators”) filed the *Reservation of Rights of the Joint Provisional Liquidators of FTX Digital Markets Ltd. Regarding the Motion of Debtors for Entry of an Order (A) Authorizing the Debtors and the Committee to Enter into Stipulation with the Voyager Debtors and Voyager Committee, (B) Approving the Stipulation, and (C) Granting Related Relief* [D.I. 819] (the “ROR”).

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

3. As of the date hereof, no other objections or responses to the Motion have been filed or served on the Debtors. To address the ROR, the Debtors have revised the proposed form of order (the “Revised Order”), a copy of which is attached hereto as **Exhibit A**. A copy of the Revised Order compared against the proposed form of order attached to the Motion is attached hereto as **Exhibit B**. The Revised Order has been circulated to the Office of the United States Trustee, the Official Committee of Unsecured Creditors appointed in these chapter 11 cases and the Joint Provisional Liquidators (collectively, the “Parties”). The Parties have no objection to the entry of the Revised Order. In accordance with the Court’s electronic order processing procedures, a clean copy of the Revised Order shall be uploaded to CM/ECF.

4. Accordingly, the Debtors respectfully request that the Court enter the Revised Order at its earliest convenience.

Dated: March 8, 2023
Wilmington, Delaware

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/s/ Kimberly A. Brown

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